IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

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U.S. DISTRICT COURT MIDDLE DISTRICT OF TM.

RUTH SMITH, Individually and ad Widow for the Use and Benefit of herself and the Next of Kin of RICHARD SMITH, Deceased,

Plaintiff,

No. 3:05-cv-00444

VS.

Judge Aleta A. Trauger

PFIZER INC., PARKE-DAVIS a division of Warner-Lambert Company and Warner-Lambert Company LLC, WARNER-LAMBERT COMPANY, WARNER-LAMBERT COMPANY LLC and JOHN DOE(S) 1-10,

Defendants.

MOTION FOR ADMISSION PRO HAC VICE OF DARA G. HEGAR, ESQ.

Dara G. Hegar, Esq. respectfully moves this Court for leave to be admitted *pro hac vice* in this case on behalf of Plaintiff Ruth Smith. In support of this motion, the applicant states as follows:

- 1. I practice law at the Lanier Law Firm, P.C., 6810 FM 1960 West, Houston, Texas 77069. I am a member of the Texas Bar, and have been admitted to practice in the following courts: United States District Court for the Eastern District of Texas and all Texas state courts. I have attached the enclosed a Certificate of Good Standing from the Texas Supreme Court dated 11/30/09.
- 2. I have been associated by Charles F. Barrett, Barrett & Associates, P.A., 6518 Highway 100, Suite 210, Nashville, Tennessee 37205, who currently represents

Plaintiff in this case and who currently resides in, and is admitted to practice, in the State of Tennessee.

- 3. I acknowledge that, in practicing before this Court, I will be subject to all disciplinary rules and procedures applicable to members of the Tennessee Bar. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, nor have I ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.
- 4. I certify that I have read and am familiar with the Uniform Local Rules of the United States District Court for the Middle District of Tennessee.

WHEREFORE, I respectfully request that the Court grant this motion to participate as an attorney in this case *pro hac vice* for Plaintiff.

Dated: December 11, 2009.

Respectfully submitted,

THE LANIER LAW FIRM, P.C.

Ken S. Soh (TSB#00794670)

W. Mark Lanier (TSB#11934600)

Dara G. Hegar (TSB#24007280)

Robert E. Leone (TSB#00792241)

Maura Kolb (TSB#00794113)

6810 FM 1960 West

Houston, TX 77069

(713) 659-5200

(713) 659-2204 (facsimile)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served via the Court's ecf filing system on this 11 day of December, 2009 on the following:

Prince C. Chambliss, Jr., Esq.

Evans & Petree, PC 1000 Ridgeway Loop Road Suite 200 Memphis, TN 38120 (901) 525-6781 pchambliss@evanspetree.com

Joel T. Galanter, Esq.

Adams and Reese LLP
Third National Financial Center
424 Church Street
Suite 2800
Nashville, TN 37219-0058
(615) 259-1450
joel.galanter@arlaw.com

Attorneys for Defendants